

**Lieff
Cabraser
Heimann&
Bernstein**
Attorneys at Law

Lieff Cabraser Heimann & Bernstein, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
t 415.956.1000
f 415.956.1008

Anne B. Shaver
Partner
ashaver@lchb.com

May 13, 2019

Via ECF

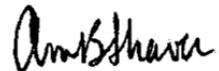
The Honorable James O. Browning
United States District Court
District of New Mexico
Pete V. Domenici United States Courthouse
333 Lomas Blvd NW, Suite 660
Albuquerque, NM 87102

Re: *Kennicott, et al. v. Sandia Corporation d/b/a Sandia National Laboratories*,
No. 17 Civ. 00188

Dear Judge Browning:

Plaintiffs' counsel has reviewed the letter filed by former Named Plaintiff Lisa Kennicott today at ECF No. 235. We disagree with the allegations contained therein, particularly with respect to our communications with Ms. Kennicott about settlement negotiations and potential assessments of costs. Because these topics implicate both attorney-client and settlement communication privileges, we defer from responding on the docket and will provide contrary evidence ex parte to the Court should it so request. Otherwise, we accept that Ms. Kennicott has consented to the Motion to Withdraw as Counsel, and thank the Court for its attention to the matter.

Respectfully submitted,



Anne B. Shaver

cc: Parties of Record (via ECF)

1725282.2